



**DEPARTMENT OF THE NAVY**  
BASE REALIGNMENT AND CLOSURE  
PROGRAM MANAGEMENT OFFICE SOUTHEAST  
4130 FABER PLACE DRIVE  
SUITE 202  
NORTH CHARLESTON, SC 29405

**BPMOSE med/0127**  
**02 Jul 10**

U.S. Environmental Protection Agency  
Region 2  
Mr. Timothy Gordon  
290 Broadway – 22nd Floor  
New York, NY 10007-1866

**Subj: NAVAL ACTIVITY PUERTO RICO VARIOUS SCHEDULE EXTENSION REQUESTS FOR: SWMU 1 AND 2 ICM WORK PLANS AND DESIGN DOCUMENTS; FRESHWATER DRAINAGE DITCH SEDIMENT ADDENDUM TO INORGANIC BACKGROUND REPORT; NEW SWMU 80 DRAFT PHASE I RFI WORK PLAN; SWMU 56 DRAFT CMS REPORT; AOC F BUILDING 1738 MTBE PLUME CHARACTERIZATION AND PILOT-SCALE TREATABILITY STUDY; CLOSEOUT REPORT FOR SWMUs 9, 13, 46, 53 AND AOC C; SWMU 61 DRAFT CMS REPORT**

Dear Mr. Gordon:

In accordance with the Navy's letter dated 5 April 2010, the Navy was to have submitted the following Solid Waste Management Unit (SWMU) 1 and 2 documents by 30 June 2010:

- Interim Corrective Measures (ICM) Work Plans.
- Response to United States Environmental Protection Agency (USEPA) Comments on the Draft ICM Work Plan.
- Draft Preliminary Remediation Goals Development.
- Draft Design Package (Basis of Design, Work Plan, and Plans and Specifications) for ICM at SWMU 1.
- Draft Design Package (Basis of Design, Work Plan, and Plans and Specifications) for ICM at SWMU 2.

The Navy hereby requests an extension until 13 August 2010 for all the above SWMU 1 and 2 documents except for the Draft Design Package for ICM at SWMU 1. This document will be submitted at a future date yet to be determined following the completion of the munitions and explosives of concern work currently underway at SWMU 1.

In accordance with the decisions made regarding the Summary Report for Environmental Background Concentrations of Inorganic Compounds Addendum C for Freshwater Drainage Ditches during the telcon held on 1 July 2010 between USEPA, Navy, Baker Environmental and Tech Law, the Navy hereby requests an extension until 30 July 2010 for the submittal of this document.

In accordance with USEPA's letter dated 11 May 2010, the Navy was to submit for SWMU 56/56A the Draft Phase I RCRA Facility Investigation (RFI) Work Plan. The Navy hereby requests that SWMU 56A be redesignated as new SWMU 80. The Navy recently (17 June 2010) awarded the contract for the development of the SWMU 80 Draft Phase I RFI Work Plan. Therefore, the Navy requests an extension until 16 August 2010 for the submittal of the SWMU 80 Draft Phase I RFI Work Plan.

In accordance with USEPA's letter dated 11 May 2010, the Navy was to submit for SWMU 56 the revised Draft Corrective Measures Study (CMS) Report within 60 days of receipt of subject letter. This document is dependent on the approval of the above Summary Report for Environmental Background Concentrations of Inorganic Compounds Addendum C Freshwater Drainage Ditches addressed above. Therefore, the Navy hereby requests an extension until 29 October 2010 for the submittal of the SWMU 56 revised Draft CMS Report. This request is in accordance with the telcon discussions held 25 May 2010 between USEPA, Navy and Baker Environmental.

As stated in USEPA's letter dated 11 May 2010, the Navy was to submit for Area of Concern (AOC) F Building 1738 MTBE plume a draft CMS Work Plan to implement the additional MTBE characterization and a pilot-scale treatability study to determine the effectiveness of in-situ, enhanced bioremediation on MTBE within 60 days of receipt of subject letter. On 29 April 2010, Baker Environmental submitted a letter to USEPA on behalf of the Navy regarding the AOC F Building 1738 MTBE investigation. The Navy hereby wishes to use the sampling plan discussed in this letter as the MTBE investigation work plan for the AOC F Building 1738 MTBE plume characterization. Upon receipt of the data from this field work, the Navy will prepare a report to document the MTBE sampling results and provide the draft pilot-scale treatability study work plan. The Navy recently (17 June 2010) awarded the contract for the MTBE pilot-scale treatability study. Therefore, scheduled submittal date of this document is 10 December 2010. This request is in accordance with the telcon discussions held 25 May 2010 between USEPA, Navy and Baker Environmental.

In accordance with USEPA letter dated 11 March 2010, the Navy was to have submitted the Project Closeout Report for SWMUs 9, 13, 46, 53 and AOC C by 14 May 2010. The Navy has been delayed in addressing EPA and EQB comments due to the original

contractor who conducted this work is no longer under contract. The Navy has been working diligently with this contractor to obtain the necessary files and information to address the comments. The Navy hereby requests an extension until 6 August 2010 for the submittal of the Project Closeout Report.

In accordance with USEPA letter dated 11 May 2010, the Navy was to have submitted the SWMU 61 Draft CMS Report by 8 June 2010. This report is dependent on the approval of the above Summary Report for Environmental Background Concentrations of Inorganic Compounds Addendum C Freshwater Drainage Ditches. The Navy hereby requests an extension until 29 October 2010 for the submittal of the SWMU 61 Draft CMS Report.

Should you have any questions, please contact me at (843) 743-2124 or via email at [mark.e.davidson@navy.mil](mailto:mark.e.davidson@navy.mil).

Sincerely,



MARK E. DAVIDSON  
BRAC Environmental Coordinator

Copy to (via mail):

EPA Region 2 (Dale Carpenter)

USEPA Caribbean Environmental Protection Division (Carl Soderberg)

PREQB (Julio Rodriquez Colón, Wilmarie Rivera, Gloria Toro-Agrait)

Copy to (via email):

Baker Environmental (Mark Kimes)

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